

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re: Robert A Nicholson)	Case no. 19-13696
)	
)	Chapter 13
)	
Debtor)	Judge: A. Benjamin Goldgar
)	

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

Robert A Nicholson
703 N Bernice Ln
Round Lake, IL 60073

David M Siegel
790 Chaddick Dr
Wheeling, IL 60090

Pinnacle Service Solutions LLC
4808 Milestrip Rd #247
Blasdell, NY 14219

Please take notice that on Friday, February 21, 2020 at 10:00 am, a representative of this office shall appear before the Honorable Judge A. Benjamin Goldgar at the Park City Branch Court, 301 Greenleaf Ave, Rm B, Park City, IL 60085 and present the motion set forth below.

I certify that this office caused a copy of this notice to be delivered to the above listed debtor and creditor by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on Thursday, December 19, 2019.

/s/ Benjamin Ruggles

For: Glenn Stearns, Trustee

OBJECTION TO CLAIM # 16

Now comes Glenn Stearns, Chapter 13 Trustee, and requests disallowance of the above referenced claim pursuant to 1 U.S.C. Section 502(b) and in support thereof, states the following:

1. On May 13, 2019 the Debtor filed a petition under Chapter 13.
2. The bar date for non-governmental creditors to file claims was 7/22/2019.
3. PINNACLE SERVICE SOLUTIONS filed a claim on July 23, 2019 (# 16 on PACER) in the amount of \$380.00; the claim was filed after the claims bar date.
4. Pursuant to §502(b)(9) if an objection is made to a claim that was filed after the applicable bar date it must be disallowed as not timely filed.

WHEREFORE, the Trustee prays that said late filed claim of Pinnacle Service Solutions be disallowed, and for such other and further relief as this court deems proper.

Respectfully Submitted;

/s/ Glenn Stearns

For: Glenn Stearns, Trustee

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
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